

# EXHIBIT C

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA  
ex rel. JULIE LONG,  
Plaintiffs,  
vs.  
JANSSEN BIOTECH, INC.,  
Defendant.

Civil Action No.: 16-12182-FDS

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VIDEOTAPED DEPOSITION OF FREDDY JIMENEZ  
Thursday, July 25, 2024  
Conducted Remotely

REPORTED BY:

Christina Diaz, RDR CRC CRR RMR CSR-NY/NJ CLR  
HUDSON COURT REPORTING & VIDEO 1-800-310-1769

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July 25, 2024

9:04 A.M. E.S.T.

Videotaped deposition of FREDDY  
JIMENEZ, taken by plaintiffs, conducted  
remotely, before Christina Diaz, a  
Registered Diplomate Reporter, Certified  
Realtime Captioner, Certified Realtime and  
Registered Merit Reporter and Notary Public  
within and for the State of New York.

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15       BY:     JASON C. RAOFIELD, ESQUIRE

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18               CHRISTOPHER N. DENIG, ESQUIRE

19               LAURA WILK, ESQUIRE

20               SCOTT GARFING, ESQUIRE

21

22       ALSO PRESENT:

23               PASHA KORNEYCHUK, Videographer

24

25

1 BY MR. RAZAVI:

2 Q. Sure. Would having input as to  
3 the antikickback or false claims  
4 implications as it pertains to ABS  
5 promotional strategies fall within the  
6 responsibility of the legal member or  
7 members of the PRC?

8 A. Yes. And other people consulted,  
9 yes.

10 Q. And the other people -- you are  
11 referring to other lawyers, correct?

12 A. Yes.

13 Q. Okay. Functionally, could any  
14 nonlegal member of the PRC override the  
15 legal members' conclusions regarding  
16 Antikickback Statute violations of any ABS  
17 materials or presentations?

18 A. Sorry. Could you repeat that.

19 Q. Sure. Again, this is  
20 functionally, basically an SOP question.  
21 Functionally, could any nonlegal member of  
22 the PRC override a legal member of the  
23 PRC's conclusions regarding Antikickback  
24 Statute violations of any ABS materials or  
25 presentations?

1                   MR. RAOFIELD: So I do think that  
2                   is functional. Out of an abundance of  
3                   caution, I would say, this, again is  
4                   one of these areas where we are not --  
5                   it's always hard to anticipate how  
6                   something could later be used to say  
7                   that we have waived privilege. We are  
8                   not suggesting that we are offering any  
9                   evidence relating to this. I  
10                  understand you are just asking a  
11                  question about functionally how PRC  
12                  worked. So on that basis, I will allow  
13                  him to answer the question.

14                A.       I don't believe so.

15       BY MR. RAZAVI:

16                Q.       Okay. Again, this is all  
17                  functional that I am asking.

18                        Was the legal member of the PRC  
19                  the individual who was responsible for  
20                  evaluating whether there was independent  
21                  value for the ABS programs or services that  
22                  are being provided through the site of care  
23                  program?

24                       MR. RAOFIELD: Let me read that  
25                  question. I think that we have now